



DART
DISPOSAL AND RECYCLING TECHNOLOGIES, INC.

4132 Pompano Road, Charlotte, NC 28216 Phone: 704/395-9559 Fax: 704/395-9579

July 12, 2013

CERTIFIED MAIL/RETURN RECEIPT
7011 0470 0000 6707 7007

Ms. Katherine O'Neal
North Carolina Department of Environment and Natural Resources
Hazardous Waste Section
1646 Mail Service Center
Raleigh, North Carolina 27699-1646

Re: Wastewater Treatment Unit Exemption Determination

Dear Ms. O'Neal:

I am enclosing a copy of a letter received from the Charlotte Mecklenburg Utility Department System Protection Division authorizing DART Acquisitions, LLC (DART) to construct and install additional wastewater pretreatment equipment at its Charlotte facility located at 4132 Pompano Road. The equipment as described in their approval letter is for the removal or stripping of volatile organic compounds in contaminated wastewater using conventional wastewater treatment technologies recognized and used by both industry and EPA superfund waste sites.

Since these units are being used for wastewater pretreatment and recognized as such by Charlotte's sewer authority they will be managed under the wastewater treatment unit exemption. This is based on the fact these units meet the three-part definition of a "wastewater treatment unit" as define in 260.10 outlined below:

- (1) These units are part of a wastewater treatment facility subject to regulations under Section 307(b) of the Clean Water Act for facilities that discharge to publicly owned treatment works (POTW). DART operates under a wastewater discharge permit issued by the Charlotte Mecklenburg Utility Department (POTW).
- (2) These units will receive and treat or store an influent wastewater that is hazardous waste as defined in 261.3.
- (3) These units meet the definition of a tank and/or tank system as defined in 260.10.

The influent waste will be substantially water with a few percent volatile organic compounds (VOC) ranging from one percent to four percent. The thermal vacuum stripper operates on the principle of removing volatile organics by slightly elevating the temperature of the contaminated wastewater and reducing the atmospheric pressure by a vacuum pump. Under these two conditions it greatly increases the capability of VOC removal through vaporization. The vapors passing through a condenser are liquefied and collected for use as a product solvent or used in DART'S outbound supplemental fuels program. The air stripper is used in conjunction with the thermal vacuum stripper to remove any residual volatiles. A copy of the process flow diagram and unit layout is enclosed. These drawings were submitted in DART's hazardous waste permit reapplication on April 30, 2013.

DART is requesting the Department's concurrence for our wastewater treatment unit exemption determination based on the above criteria.

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Should have any questions regarding the above, please contact me at 704-395-9559.

Sincerely,


James Kreger, CHMM
Compliance Manager

Enclosures